

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ERIC MICHAEL ROSEMAN, et al.,
individually and on behalf of others similarly
situated,

Plaintiffs,

v.

BLOOMBERG L.P.,

Defendant.

Case No. 14 CV 2657 (DLC)

**NOTICE OF JOINT MOTION FOR PRELIMINARY APPROVAL OF CLASS
SETTLEMENT AND APPROVAL OF PROPOSED NOTICE OF SETTLEMENT**

For the reasons set forth in the Parties' Memorandum of Law in Support of the Joint Motion for Preliminary Approval of Class Settlement and Approval of Proposed Notice of Settlement; Plaintiffs' Supplemental Memorandum in Support of Preliminary Approval of Class Counsel's Fees and Costs; Plaintiffs' Supplemental Memorandum in Support of Preliminary Approval of Service Awards; and in the Declaration of Dan Getman and supporting documents, the Parties respectfully request that the Court enter an Order:

1. Granting the Parties' request to include all Class Members, with the exception of Opt-Outs, as Qualified Class Members subject to the terms of the Settlement Agreement;
2. Granting preliminary approval of the Settlement as memorialized in the Parties' Settlement Agreement, attached as Exhibit 1 to the Declaration of Dan Getman in support of this motion and entering the Preliminary Approval Order, in the form attached as Exhibit C to the Settlement Agreement;

3. Scheduling the Final Fairness Hearing, which, because of the timing requirements in the Class Action Fairness Act (“CAFA”) and the settlement administration schedule agreed to by the Parties in the Agreement, must be no earlier than 120 days from the date of this Motion;
4. Approving the Settlement Forms, attached as Exhibits A and B to the Settlement Agreement, and manner of notice;
5. Approving Settlement Services, Inc. (“SSI”) as Settlement Administrator; and
6. Approving Make the Road New York and The Consortium for Worker Education as the cy pres recipients.

The Parties have contemporaneously submitted a Proposed Order, attached to the Settlement Agreement as Exhibit C, for the Court’s convenience.

Dated: June 19, 2018

Respectfully Submitted,

/s/ Dan Getman
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